

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

UNITED STATES OF AMERICA	)	
	)	
<i>Plaintiff</i>	)	
	)	
v.	)	Case No. 4:21-cr-005-O-1
	)	
THE BOEING COMPANY,	)	
	)	
<i>Defendant</i>	)	
_____	)	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
LETTER OF MS. ERIN COX**

Undersigned counsel for Movants Naoise Connolly Ryan, Emily Chelangat Babu and Joshua Mwazo Babu, Catherine Berthet, Huguette Debets, Luca Dieci, Bayihe Demissie, Sri Hartati, Zipporah Kuria, Javier de Luis, Nadia Milleron and Michael Stumo, Chris Moore, Paul Njoroge, Yuke Meiske Pelealu, John Karanja Quindos, and Guy Daud Iskandar Zen S. (“victims’ families”) move for an extension of time to file a response to Ms. Erin Neely Cox’s declaration.

As this Court is aware, the victims’ families have filed a Motion for Findings that the Proposed Boeing Deferred Prosecution Agreement was Negotiated in Violation of Crime Victims’ Rights Act (“Victims’ Rights Motion”) (DE 15).

On January 11, 2022, the Court directed the Government, Boeing, and the victims’ families to all respond a declaration from Ms. Cox’s declaration by Tuesday, January 18, 2022. Thereafter, the Government and Boeing received an extension of time to file their response until Thursday, January 20, 2022.

The victims' families move for an extension of time to respond to Ms. Cox's declaration and request that they be permitted to respond no later than January 20, 2022.

Counsel for Ms. Cox and Boeing have agreed to the requested extension. As of this filing, counsel has not heard back from the Government on its position.

Dated: January 18, 2022

Respectfully submitted,

/s/ Warren T. Burns

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Admitted *pro hac vice*

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Utah Appellate Project

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ATTORNEYS FOR VICTIMS' FAMILIES

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Criminal Rule 47.1(b), on January 14, 2022, counsel for the United States conferred with counsel for the United States of America, counsel for The Boeing Company, and counsel for the third-party declarant, Marianne M. Auld, Esq., via email. Counsel for The Boeing Company and the third-party declarant have stated they are unopposed to the extension to January 20, 2022. As of this filing, counsel has not heard back on the position of the Government.

/s/ Warren T. Burns

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Warren T. Burns

**CERTIFICATE OF SERVICE**

I certify that on January 18, 2022, the foregoing document was served on the parties to the proceedings via the Court CM/ECF filing system.

/s/ Warren T. Burns

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Warren T. Burns